

Exhibit A

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

CHRISTOPHER GODSON, on behalf of himself and all others similarly situated,)
)
)
Plaintiff,) No. 1:11-cv-0764-EAW-HKS
)
)
v.)
)
ELTMAN, ELTMAN & COOPER, P.C., and LVNV FUNDING, LLC,)
)
Defendants.)

**ATTORNEY TIME RECORDS
KENNETH R. HILLER, ESQ.**

DATE	ACTIVITY	TIME
4/5/2011	Telephone conference with client; discuss facts of his case; Request that he provide all documents	0.5 hrs.
4/27/2011	Review entire file, including all documents provided by client; conduct legal research to determine viability of case	3.0"
6/1/2011	Telephone conference with client; advise him additional documents needed; discuss case in general	0.4"
6/7/2011	Review additional documents provided by client	0.5"
7/7/2011	Meet with Seth Andrews to review and discuss case, and the possibility of a potential class action	1.0"
8/2/2011	Legal research on viability of class action in this case; discuss with Seth Andrews; Seth will contact potential class co-counsel	4.0"
9/8/2011	Telephone conference with Brian Bromberg to discuss proposed class action	1.0"
9/8/2018	Prepare class action complaint	3.0"
9/9/2011	Meeting with plaintiff (in person) and with Brian Bromberg, Esq. by telephone; confirm factual allegations of case, accuracy of	

	complaint. Inform plaintiff of his duties as a class representative and goals of case.	2.0"
9/21/2011	Meeting with client to discuss the status of case, to review each and every allegation in the complaint, and what to expect in case	2.0"
12/12/2011	Review answer; email exchange with co-counsel regarding merits of moving to strike frivolous affirmative	0.5"
12/12/2011	Review answers interposed by Defendant in other cases for use in Motion to Strike Affirmative Defenses	0.5"
12/12/2011	Review another answer interposed by Defendant another cases for use in Motion to Strike Affirmative Defenses	0.2"
1/2/2012	Prepare draft of motion to strike affirmative defenses, including affirmation of counsel, and 14 page memorandum of law	9.0"
1/3/2012	Review revised (by co-counsel) Motion to Strike	1.5"
1/4/2012	Telephone call with Brian Bromberg re: Rule 16 and Rule 26 conferences, and ADR procedures	0.2"
1/4/2012	Review scheduling order on Motion to Strike; diary deadlines	0.1"
1/6/2012	Prepare proposed case management order	0.3"
1/2/2012	Telephone client re: status update	0.3
2/1/2012	Receive and review scheduling order; diary deadlines	0.2"
2/16/2012	Telephone call with Brian Bromberg re: next steps in case	0.2"
2/17/2012	Review Reply brief re: Motion to Strike prepared by Co-counsel	0.6"
2/17/2012	Review flurry of emails attempting to schedule mediation	0.2"
2/17/2012	Prepare Rule 26(a)(1) disclosures; email to co-counsel	1.0"
3/26/2012	Review Motion to Certify Class; prepare affidavit in support of Motion; email to co-counsel	2.0"
3/27/2012- 3/28/2012	Review default judgment taken against plaintiff in Florida; email exchange with co-counsel discussing the ramifications	0.4"

3/28/2012	Review entire file to prepare for mediation; meet with Seth Andrews and client to discuss mediation strategy	1.5"
3/30/2012	Meet with client before mediation; attend mediation; confer with client and co-counsel after mediation	3.0"
4/6/2012	Review draft letter to Judge prepared by co-counsel	0.1"
5/18/2012	Meet with client before second mediation; attend mediation; confer with client and co-counsel after mediation	3.0"
5/21/2012-		
5/23/2012	Review settlement offer from opposing counsel; email exchange among co-counsel in which we ultimately decide to reject offer; email to mediator rejecting offer	0.5"
6/8/2012	Receive scheduling order re Mtn to Certify Class	0.1"
7/3/2012	Receive email from opposing counsel re: discovery; email exchange with co-counsel to discuss how to respond	0.3"
8/13/2012	Review of opposition to Motion to Certify Class; research cited therein; make notes of possible responses to their arguments	3.0"
8/13/2012	Telephone conference with co-counsel to discuss Defendant's Opposition to Motion	0.2"
8/19/2012	Review Defendant's discovery responses	1.0"
8/29/2012	Telephone call with co-counsel and opposing counsel re: Defendant's discovery responses	0.7"
8/29/2012	Review Reply to Response to Motion to Certify Class	1.0"
9/11/2012	Review decision granting Motion to Strike	0.2"
9/11/2012	Review text order of Court	0.1"
9/25/2012	Review Amended Answer	0.2"
9/25/2012	Telephone call to client to discuss status of case	0.4
10/1/2012	Prepare Motion to Compel and accompanying papers; file same	2.5"

10/9/2012,		
10/29/2012	Review orders scheduling Motion to Compel	0.1"
11/2/2012	Review Defendant's Opposition to Motion to Compel	1.0"
11/23/2012	Review Plaintiff's Reply to Response to Motion to Compel; File same	0.5"
1/9/2013	Telephone call to client to discuss status of case	0.3"
9/11/2013	Review order granting in part and denying in part Motion to Compel; review file to determine next steps to take	1.0"
10/8/2013	Review Plaintiff's Motion for Sanctions	1.0"
10/9/2013	Telephone call to client to discuss status of case	0.4
10/9/2013	Receive scheduling order; input deadlines in calendar	0.1"
10/18/2013	Review Defendant's Response to Motion for Sanctions	0.5"
10/18/2018	Review Defendant's Motion for Summary Judgment	2.0"
10/21/2013	Receive scheduling order; input deadlines in calendar	0.1"
10/25/2013	Review Plaintiff's Motion to Stay	0.5"
11/4/2013	Review Declaration of Concepcion Montoya in response to Motion to Stay	0.2"
11/5/2013	Review Reply to Response to Motion to Stay	0.2"
12/3/2013	Review order staying briefing of summary judgment motion	0.1"
12/6/2013	Review protective order	0.2"
12/9/2013	Review Plaintiff's Motion to Extend Discovery	0.1"
12/23/2013	Review Defendant's Response to Motion to Extend Discovery	0.1"
1/10/2014	Review Second Motion to Compel and Motions to Seal	1.0"
1/16/2014	Receive scheduling order; input deadlines in calendar	0.1"
1/30/2014	Review Defendant's Motion for Extension of Time to Response to Second Motion to Compel and Plaintiff's opposition	0.3"

1/31/2014	Receive scheduling order; input deadlines in calendar	0.1"
2/7/2014	Review Defendant's Memorandum of Law in Opposition to Second Motion to Compel	1.0"
2/7/2014	Review Defendant's Motion to Bifurcate and/or Stay	0.4"
2/14/2014	Review Memorandum in Opposition to Second Motion to Compel	0.5"
2/14/2014	Review Memorandum in Support of Motion to Bifurcate	0.3"
2/21/2014	Telephone call to client to discuss status of case	0.4
2/21/2014	Review Plaintiff's Motion for Extension of Time	0.1"
2/24/2014	Receive scheduling order; input deadlines in calendar	0.1"
2/26/2014	Review Plaintiff's Memorandum of Law in Opposition to Motion To Bifurcate	0.3"
3/4/2014	Review Defendant's Response, re :Mtn to Bifurcate	0.2"
9/15/2014	Review order disposing of motions for sanctions, motion for protective order, motion for extension of discovery deadline, motion to compel	0.5"
9/25/2014	Review Affidavit of opposing counsel alleging compliance with orders of the Court	0.4"
9/29/2014	Review Plaintiff's Fourth Motion to Seal	0.2"
9/29/2014	Review Plaintiff's Objections to Magistrate Judge's Order	0.5"
10/6/2014	Receive scheduling order; input deadlines in calendar	0.1"
10/14/2014	Review Motion for Reconsideration of Magistrate Judge's Order	0.5"
10/21/2014	Review Defendant's Motion to Stay	0.3"
10/24/2014	Review order of Judge Skretny re Motion to Reconsider and Objections	0.1"
10/24/2014	Review Plaintiff's Third Motion of Sanctions; Sixth Motion to Seal	1.0"

10/28/2014	Receive scheduling order; input deadlines in calendar	0.1"
11/25/2014	Telephone call to client to discuss status of case	0.4
11/21/2014	Review Declaration of Brian Bromberg regarding various pending motions	0.3"
11/21/2014	Review Defendant's Memorandum in Opposition to Plaintiff's Third Motion for Sanctions and Declaration of counsel	1.0"
11/21/2014	Review Defendant's Memoranda opposition to Motion for Reconsideration and other motion of Plaintiff	1.0"
12/12/2014	Review Plaintiff's Reply brief re: various motions; review Declaration of Jonathan Miller and exhibits	3.0"
9/30/2015	Review order granting in part and denying in part motions for Reconsideration and for sanctions	0.6"
5/14/2015	Telephone call to client to discuss status of case	0.4
10/14/2015	Review Memorandum of Law filed by Plaintiff re" 9/30/15 order	1.0"
10/19/2015	Receive scheduling order; input deadlines in calendar	0.1"
10/29/2015	Review Defendant's Letter Motion to Extend Time to Complete Discovery	0.1"
11/2/2015	Review orders extending discovery deadlines	0.1"
11/9/2015	Review Plaintiff's Reply Memorandum of Law	2.5"
12/22/2015	Review order of Court affirming Magistrate Judge's rulings	0.5"
1/15/2016	Review Defendant's status report letter	0.1"
1/22/2016	Telephone call to client to discuss status of case	0.4
2/2/2016	Review Plaintiff's Fourth Motion for Sanctions and all accompanying papers	2.7"
2/5/2016	Review Plaintiff's motions to seal and to extend discovery	0.4"
2/8/2016	Receive scheduling order; input deadlines in calendar	0.1"
2/22/2016	Review opposition to Fourth Motion for Sanctions	1.5"

3/7/2016	Review Reply Brief, re: Fourth Motion for Sanctions	1.5"
3/23/2016	Review Defendant's Sur-reply	0.2"
4/15/2016	Order granting in part and denying in part Motion for Sanctions	0.4"
4/22/2016	Telephone call to client to discuss status of case	0.3
5/9/2016	Review Defendant's Motion for Protective Order	0.3"
5/13/2016	Review Declaration of Meghan Emmerich	0.3"
5/26/2016	Review Fifth Motion for Sanctions	3.0"
5/27/2016	Review declaration and memorandum of law in opposition to Motion for protective order	1.0"
6/2/2016	Receive scheduling order; input deadlines in calendar	0.1"
6/24/2016	Review Defendant's opposition to Fifth Motion for Sanctions	2.0"
6/24/2016	Review Defendant's Reply brief re: motion for protective order	1.0"
7/15/2016	Review Reply brief re: 5 th Motion for Sanctions and Declaration	1.0"
9/26/2016	Telephone call to client to discuss status of case	0.4
1/9/2017	Review order granting motion for protective order; denying Motion for sanctions	0.4"
1/9/2017	Receive scheduling order; input deadlines in calendar	0.1"
3/17/2017	Receive scheduling order; input deadlines in calendar	0.1"
5/26/2017, 6/28/2017	Review motions to extend discovery deadlines	0.3"
6/29/2017	Review order granting extension	0.1"
6/29/2017	Telephone call to client to discuss status of case	0.3"
7/31/2017	Review Motion to Extend Discovery Deadline	0.2"
8/1/2017	Receive scheduling order; input deadlines in calendar	0.1"

9/29/2017	Review Motion to Extend Discovery Deadline	0.2"
10/2/2017	Receive scheduling order; input deadlines in calendar	0.1"
2/6/2018	Receive scheduling order; input deadlines in calendar	0.1"
4/1/2018	Prepare declaration for upcoming Motion to Certify Class	1.0"
4/2/2018	Review Motion to Certify Class	0.5"
4/4/2018	Receive scheduling order; input deadlines in calendar	0.1"
4/11/2018	Telephone call to client to discuss status of case	0.4
4/23/2018	Review Memorandum in Support of Class Certification	0.3"
5/21/2018	Review Order of Preliminary Approval of Class Action Settlement	0.3"
7/30/2018	Review text order	0.1"
9/20/2018	Prepare declaration in support of fee application	2.0"
Total:		108.4

\$450.00 per hour x 108.4 = \$48,780.00

Out-of-Pocket Expenses

9/9/11	Federal court filing fee	\$350
10/25/11	Servico, Inc. - service of Complaint via Sec. State, both defendants	120
Total:		\$470